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**From:** Odusote, Gloria [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=ODUSOTE, GLORIA]  
**Sent:** 6/8/2018 8:19:33 PM  
**To:** Richard E. Engler, Ph.D. [rengler@lawbc.com]  
**Subject:** RE: PMN risk assessment

Hi Rich,

There is another health assessment though usually the POD is listed in the SAT. I'll work on getting that to you.

The endpoint is lung toxicity due to lung overload. The POD is based on the LOAEC for poorly soluble respirable particles, which is 3.3 mg/m<sup>3</sup> with an acceptable benchmark of 1000. Thus the NCEL is .0033mg/m<sup>3</sup>.

Best,  
Gloria

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**From:** Richard E. Engler, Ph.D. [mailto:rengler@lawbc.com]  
**Sent:** Friday, June 8, 2018 2:20 PM  
**To:** Odusote, Gloria <odusote.gloria@epa.gov>  
**Subject:** PMN risk assessment

Gloria:

Is there a health assessment somewhere? The focus report goes into significant detail about the ecotox assessment (in Section IV) but provides no insight into the health hazard assessment. The Focus report goes directly to exposures (in section V) and the Decision/rationale (in Section VI) without any additional detail.

The OPPT new chemical category document specifies that TiO<sub>2</sub> (and analogs) would have a NCEL of 5 mg/m<sup>3</sup>.

Furthermore, although the submitter does not have specific information about all potential customer sites, we expect that such sites will handle titanium dioxide pigments, so must have dust control measures to keep ambient concentrations below the 10 mg/m<sup>3</sup> OSHA PEL for nuisance dust (and below the 15 mg/m<sup>3</sup> assumed in the engineering assessment) as well as below the PEL for titanium dioxide 5 mg/m<sup>3</sup>.

Please advise what POD or NCEL that RAD used in its risk assessment and the analog upon which that POD is based.

Rich

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**RICHARD E. ENGLER, PH.D.**  
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**From:** Odusote, Gloria <odusote.gloria@epa.gov>  
**Sent:** Wednesday, June 6, 2018 7:10 PM  
**To:** Richard E. Engler, Ph.D. <rengler@lawbc.com>  
**Subject:** RE: My contact information

Hi Rich,  
I faxed you all of the reports but I can't tell if it went through. Please let me know if you received it.

Also, your Day 90 is coming up, so I'll suspend 15 days.

Best,  
Gloria

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**From:** Richard E. Engler, Ph.D. [mailto:rengler@lawbc.com]  
**Sent:** Monday, May 14, 2018 5:26 PM  
**To:** Odusote, Gloria <odusote.gloria@epa.gov>  
**Subject:** My contact information

Gloria:

Thank you for giving me an update. I look forward to reviewing the reports.

Rich

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**RICHARD E. ENGLER, PH.D.**  
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